

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RAHUL MEWAWALLA,

Plaintiffs,

v.

STANLEY C. MIDDLEMAN, et al.,

Defendants.

Case No. [21-cv-09700-EMC](#)

ORDER RE: VERDICT FORM

Docket No. 269

The Parties filed a joint stipulated verdict form, as ordered by the Court. Docket No. 269. Given the specificity of the jury instructions, the Court has revised the form to be a general verdict form. Parties are to meet and confer, and file a JOINT submission by **Thursday, January 23, 2025**, if there are any further issues or objections to the proposed verdict form herein.

IT IS SO ORDERED.

Dated: January 22, 2025



EDWARD M. CHEN
United States District Judge

We, the jury, agree to the answers to the following questions and return them under the instructions of this Court as our verdict in this case:

I. VERDICT FORM 1 PLAINTIFF'S CLAIMS

Plaintiff's False Promise Claim (Count 1) and Fraudulent Concealment Claim (Count 2)

1. Has Plaintiff proven his False Promise Claim (Count 1)?
_____ Yes (for Plaintiff) _____ No (for Defendants)

2. Has Plaintiff proven his Fraudulent Concealment Claim (Count 2)?
_____ Yes (for Plaintiff) _____ No (for Defendants)

If you found for Plaintiff on either question 1 or question 2, answer question 3.

3. What are Rahul Mewawalla's damages?
\$_____

Plaintiff's Breach of Contract Claim (Against Freedom Mortgage Corporation) (Count 5)

1. Has Plaintiff proven his Breach of Contract Claim Against Freedom Mortgage Corporation (Count 5)?
_____ Yes (for Plaintiff) _____ No (for Defendant Freedom)

If you found for Plaintiff on question 1, answer question 2.

2. What are Rahul Mewawalla's damages?
\$_____

Plaintiff's Breach of Contract Claims (Against Xpanse, LLC) (Count 5 and Count 6)

1. Has Plaintiff proven his Breach of Contract Claim Against Xpanse (Count 5)?
_____ Yes (for Plaintiff) _____ No (for Defendant Xpanse)

2. Has Plaintiff proven his Breach of Implied Covenant of Good Faith and Fair
Dealing Claim Against Xpanse (Count 6)?
_____ Yes (for Plaintiff) _____ No (for Defendant Xpanse)

If you found for Plaintiff on either question 1 or question 2, answer question 3.

3. What are Rahul Mewawalla's damages?
\$_____

4. If you find for Plaintiff on Count 5 against Freedom, and for Plaintiff on Counts 5
or 6 against Xpanse, what portion (if any) of the damages awarded against Xpanse
are overlapping with the award against Freedom?
\$_____

Punitive Damages

1. Do you find punitive damages are warranted?

_____Yes _____No

2. If you answered yes to question 1, against whom?

_____Defendant Stanley Middleman

_____Defendant Freedom Mortgage Corporation

3. What amount of punitive damages, if any, do you award Rahul Mewawalla?

\$_____ against Defendant Stanley Middleman

\$_____ against Defendant Freedom Mortgage Corporation

II. VERDICT FORM 2 DEFENDANT'S COUNTERCLAIM

Defendant Freedom Mortgage's Breach of Contract Claim (Counterclaim 1)

1. Has Defendant Freedom Mortgage proven its Breach of Contract Claim against Plaintiff?

_____ Yes (for Defendant Freedom) _____ No (for Plaintiff)

If you found for Defendant Freedom, then answer question 2.

3. What are Freedom's damages, if any?

\$_____.

Thank you for your service on this jury. Please sign and return the verdict form to the Clerk.

Signed: _____

Presiding Juror

Dated: _____